

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

No. 5:20-CR-515-M(1)

UNITED STATES OF AMERICA)

v.)

PRAKASHKUMAR BAVABHAI PATEL)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about June 4, 2012, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly attempt to procure his naturalization as a United States citizen contrary to law, by making false statements under penalty of perjury regarding his naturalization application, that is:

- a. On Part 1., Question C of his Application for Naturalization (Form N-400), in response to the question "If you have ever used other names, provide them below" he answered "None" when in fact, as he then knew, he had used the name "Bawabhai Wadiwala Chandraprakash" on June 22, 1989, when he presented himself at the Logan International Airport in Boston, Massachusetts, applying for admission into the United States.
- b. In Part 10.D., Question 15 of his Application for Naturalization (Form N-400), in response to the question "Have you ever committed a crime or offense for which you were not arrested?" he answered "No" when in fact, as he then knew, he had acquired his lawful permanent resident status on September 4, 2007, contrary to law, in that he made willful and material false statements and misrepresentations in his March 20, 2007, Application to Register Permanent Residence or Adjust Status (Form I-485) when he failed to disclose his prior use of the name

"Bawabhai Wadiwala Chandraprakash," his immigration arrest on June 22, 1989, and his deportation from the United States on July 6, 1989.

- c. On Part 10.D., Question 16 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been arrested, cited, or detained by any law enforcement officers (including USICS or former INS and military officers) for any reason?" he answered "No" when in fact, as he then knew, he had been arrested and detained on June 22, 1989, by the Immigration and Naturalization Service in Boston, Massachusetts.
- d. On Part 10.D., Question 21 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been in jail or prison?" he answered "No" when in fact, as he then knew, he had been detained in jail on June 22, 1989, at the Boston Service Processing Center in Boston, Massachusetts.
- e. On Part 10.D., Question 23 of his Application for Naturalization (Form N-400), in response to the question "Have you ever given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?" he answered "No" when in fact, as he then knew, he had made willful and material false statements and misrepresentations on his March 20, 2007, Application to Register Permanent Residence or Adjust Status (Form I-485) when he failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash," his immigration arrest on June 22, 1989, and his deportation from the United States on July 6, 1989.
- f. On Part 10.E., Question 24 of his Application for Naturalization (Form N-400), in response to the question "Have you ever lied to any U.S. Government official to gain entry into or admission into the United States?" he answered "No" when in fact, as he then knew, he had lied to Immigration and Naturalization Service officials at the Logan International Airport in Boston, Massachusetts, on June 22, 1989, when he applied for admission into the United States using the false name "Bawabhai Wadiwala Chandraprakash" and a page-substituted fraudulent passport in the same name.
- g. On Part 10.E., Question 26 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been removed,

excluded, or deported from the United States?" he answered "No" when in fact, as he then knew, he had been excluded and deported from the United States on July 6, 1989, at the Logan International Airport in Boston, Massachusetts.

- h. On Part 10.E., Question 27 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been ordered to be removed, excluded, or deported from the United States?" he answered "No" when in fact, as he then knew, he had been ordered excluded and deported from the United States on June 29, 1989, at Boston, Massachusetts.

All in violation of Title 18, United States Code, Section 1425(a).

COUNT TWO

On or about September 18, 2012, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly attempt to procure his naturalization as a United States citizen contrary to law, by willfully making a material misrepresentation under oath during his naturalization interview, that is:

- a. On Part 1., Question C of his Application for Naturalization (Form N-400), in response to the question "If you have ever used other names, provide them below" he answered "None" when in fact, as he then knew, he had used the name "Bawabhai Wadiwala Chandraprakash" on June 22, 1989, when he presented himself at the Logan International Airport in Boston, Massachusetts, applying for admission into the United States.
- b. In Part 10.D., Question 15 of his Application for Naturalization (Form N-400), in response to the question "Have you ever committed a crime or offense for which you were not arrested?" he answered "No" when in fact, as he then knew, he had acquired his lawful permanent resident status on September 4, 2007, contrary to law, in that he made willful and material false statements and misrepresentations in his March 20, 2007, Application to Register Permanent Residence or Adjust Status (Form I-485) when he failed to disclose his prior use of the name

"Bawabhai Wadiwala Chandraprakash," his immigration arrest on June 22, 1989, and his deportation from the United States on July 6, 1989.

- c. On Part 10.D., Question 16 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been arrested, cited, or detained by any law enforcement officers (including USICS or former INS and military officers) for any reason?" he answered "No" when in fact, as he then knew, he had been arrested and detained on June 22, 1989, by the Immigration and Naturalization Service in Boston, Massachusetts.
- d. On Part 10.D., Question 21 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been in jail or prison?" he answered "No" when in fact, as he then knew, he had been detained in jail on June 22, 1989, at the Boston Service Processing Center in Boston, Massachusetts.
- e. On Part 10.D., Question 23 of his Application for Naturalization (Form N-400), in response to the question "Have you ever given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?" he answered "No" when in fact, as he then knew, he had made willful and material false statements and misrepresentations on his March 20, 2007, Application to Register Permanent Residence or Adjust Status (Form I-485) when he failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash," his immigration arrest on June 22, 1989, and his deportation from the United States on July 6, 1989.
- f. On Part 10.E., Question 24 of his Application for Naturalization (Form N-400), in response to the question "Have you ever lied to any U.S. Government official to gain entry into or admission into the United States?" he answered "No" when in fact, as he then knew, he had lied to Immigration and Naturalization Service officials at Logan International Airport in Boston, Massachusetts on June 22, 1989, when he applied for admission into the United States using the false name "Bawabhai Wadiwala Chandraprakash" and a page-substituted fraudulent passport in the same name.
- g. On Part 10.E., Question 26 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been removed,

excluded, or deported from the United States?" he answered "No" when in fact, as he then knew, he had been excluded and deported from the United States on July 6, 1989, at the Logan International Airport in Boston, Massachusetts.

- h. On Part 10.E., Question 27 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been ordered to be removed, excluded, or deported from the United States?" he answered "No" when in fact, as he then knew, he had been ordered excluded and deported from the United States on June 29, 1989, at Boston, Massachusetts.

All in violation of Title 18, United States Code, Section 1425(a).

COUNT THREE

On or about September 28, 2012, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly procure his naturalization as a United States citizen contrary to law, by knowingly making a material misrepresentation causing his acquisition of citizenship, that is:

- a. On Part 1., Question C of his Application for Naturalization (Form N-400), in response to the question "If you have ever used other names, provide them below" he answered "None" when in fact, as he then knew, he had used the name "Bawabhai Wadiwala Chandraprakash" on June 22, 1989, when he presented himself at the Logan International Airport in Boston, Massachusetts, applying for admission into the United States.
- b. In Part 10.D., Question 15 of his Application for Naturalization (Form N-400), in response to the question "Have you ever committed a crime or offense for which you were not arrested?" he answered "No" when in fact, as he then knew, he had acquired his lawful permanent resident status on September 4, 2007, contrary to law, in that he made willful and material false statements and misrepresentations in his March 20, 2007, Application to Register Permanent Residence or Adjust Status (Form I-485) when he failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash," his immigration arrest on

June 22, 1989, and his deportation from the United States on July 6, 1989.

- c. On Part 10.D., Question 16 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been arrested, cited, or detained by any law enforcement officers (including USICS or former INS and military officers) for any reason?" he answered "No" when in fact, as he then knew, he had been arrested and detained on June 22, 1989, by the Immigration and Naturalization Service in Boston, Massachusetts.
- d. On Part 10.D., Question 21 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been in jail or prison?" he answered "No" when in fact, as he then knew, he had been detained in jail on June 22, 1989, at the Boston Service Processing Center in Boston, Massachusetts.
- e. On Part 10.D., Question 23 of his Application for Naturalization (Form N-400), in response to the question "Have you ever given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?" he answered "No" when in fact, as he then knew, he had made willful and material false statements and misrepresentations on his March 20, 2007, Application to Register Permanent Residence or Adjust Status (Form I-485) when he failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash," his immigration arrest on June 22, 1989, and his deportation from the United States on July 6, 1989.
- f. On Part 10.E., Question 24 of his Application for Naturalization (Form N-400), in response to the question "Have you ever lied to any U.S. Government official to gain entry into or admission into the United States?" he answered "No" when in fact, as he then knew, he had lied to Immigration and Naturalization Service officials at the Logan International Airport in Boston, Massachusetts, on June 22, 1989, when he applied for admission into the United States using the false name "Bawabhai Wadiwala Chandraprakash" and a page-substituted fraudulent passport in the same name.
- g. On Part 10.E., Question 26 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been removed, excluded, or deported from the United States?" he answered "No" when

in fact, as he then knew, he had been excluded and deported from the United States on July 6, 1989, at the Logan International Airport in Boston, Massachusetts.

- h. On Part 10.E., Question 27 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been ordered to be removed, excluded, or deported from the United States?" he answered "No" when in fact, as he then knew, he had been ordered excluded and deported from the United States on June 29, 1989, at Boston, Massachusetts.

All in violation of Title 18, United States Code, Section 1425(a).

COUNT FOUR

On or about September 28, 2012, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly procure evidence of citizenship for himself, to which he was not entitled, that is, the defendant obtained Certificate of Naturalization # XXXXX1590 by virtue of his naturalization as a United States citizen, which the defendant knew to have been procured contrary to law, in that:

- a. On Part 1., Question C of his Application for Naturalization (Form N-400), in response to the question "If you have ever used other names, provide them below" he answered "None" when in fact, as he then knew, he had used the name "Bawabhai Wadiwala Chandraprakash" on June 22, 1989, when he presented himself at the Logan International Airport in Boston, Massachusetts, applying for admission into the United States.
- b. In Part 10.D., Question 15 of his Application for Naturalization (Form N-400), in response to the question "Have you ever committed a crime or offense for which you were not arrested?" he answered "No" when in fact, as he then knew, he had acquired his lawful permanent resident status on September 4, 2007, contrary to law, in that he made willful and material false statements and misrepresentations in his March 20, 2007, Application to Register Permanent Residence or Adjust Status

(Form I-485) when he failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash," his immigration arrest on June 22, 1989, and his deportation from the United States on July 6, 1989.

- c. On Part 10.D., Question 16 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been arrested, cited, or detained by any law enforcement officers (including USICS or former INS and military officers) for any reason?" he answered "No" when in fact, as he then knew, he had been arrested and detained on June 22, 1989, by the Immigration and Naturalization Service in Boston, Massachusetts.
- d. On Part 10.D., Question 21 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been in jail or prison?" he answered "No" when in fact, as he then knew, he had been detained in jail on June 22, 1989, at the Boston Service Processing Center in Boston, Massachusetts.
- e. On Part 10.D., Question 23 of his Application for Naturalization (Form N-400), in response to the question "Have you ever given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?" he answered "No" when in fact, as he then knew, he had made willful and material false statements and misrepresentations on his March 20, 2007, Application to Register Permanent Residence or Adjust Status (Form I-485) when he failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash," his immigration arrest on June 22, 1989, and his deportation from the United States on July 6, 1989.
- f. On Part 10.E., Question 24 of his Application for Naturalization (Form N-400), in response to the question "Have you ever lied to any U.S. Government official to gain entry into or admission into the United States?" he answered "No" when in fact, as he then knew, he had lied to Immigration and Naturalization Service officials at the Logan International Airport in Boston, Massachusetts on June 22, 1989, when he applied for admission into the United States using the false name "Bawabhai Wadiwala Chandraprakash" and a page-substituted fraudulent passport in the same name.

- g. On Part 10.E., Question 26 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been removed, excluded, or deported from the United States?" he answered "No" when in fact, as he then knew, he had been excluded and deported from the United States on July 6, 1989, at the Logan International Airport in Boston, Massachusetts.
- h. On Part 10.E., Question 27 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been ordered to be removed, excluded, or deported from the United States?" he answered "No" when in fact, as he then knew, he had been ordered excluded and deported from the United States on June 29, 1989, at Boston, Massachusetts.

All in violation of Title 18, United States Code, Section 1425(b).

COUNT FIVE

On or about October 3, 2012, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did willfully and knowingly make a false statement in an application for a United States passport with the intent to secure the issuance of a passport under the authority of the United States for his own use contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, that is, the defendant declared under penalty of perjury that the statements made on the application were true and correct and that he had not knowingly and willfully made false statements or included false documents in support of the application, in that:

- a. In response to the question 9, "List all other names you have used" he provided no response, when in fact, as he then knew, he had used the name "Bawabhai Wadiwala Chandraprakash" on June 22, 1989, when he presented himself at the Logan International Airport in Boston, Massachusetts, applying for admission into the United States.

- b. As proof of United States citizenship, and evidence of eligibility for a United States passport, he submitted Certificate of Naturalization # XXXXX1590, which he knew to have been fraudulently procured by means of false claims and statements.

All in violation of Title 18, United States Code, Section 1542.

COUNT SIX

On or about October 29, 2012, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly procure evidence of citizenship for himself, to which he was not entitled, that is, the defendant obtained United States passport # XXXXX5882 by virtue of his naturalization as a United States citizen, which the defendant knew to have been procured contrary to law, in that:

- a. On Part 1., Question C of his Application for Naturalization (Form N-400), in response to the question "If you have ever used other names, provide them below" he answered "None" when in fact, as he then knew, he had used the name "Bawabhai Wadiwala Chandraprakash" on June 22, 1989, when he presented himself at the Logan International Airport in Boston, Massachusetts, applying for admission into the United States.
- b. In Part 10.D., Question 15 of his Application for Naturalization (Form N-400), in response to the question "Have you ever committed a crime or offense for which you were not arrested?" he answered "No" when in fact, as he then knew, he had acquired his lawful permanent resident status on September 4, 2007, contrary to law, in that he made willful and material false statements and misrepresentations in his March 20, 2007, Application to Register Permanent Residence or Adjust Status (Form I-485) when he failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash," his immigration arrest on June 22, 1989, and his deportation from the United States on July 6, 1989.

- c. On Part 10.D., Question 16 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been arrested, cited, or detained by any law enforcement officers (including USICS or former INS and military officers) for any reason?" he answered "No" when in fact, as he then knew, he had been arrested and detained on June 22, 1989, by the Immigration and Naturalization Service in Boston, Massachusetts.
- d. On Part 10.D., Question 21 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been in jail or prison?" he answered "No" when in fact, as he then knew, he had been detained in jail on June 22, 1989, at the Boston Service Processing Center in Boston, Massachusetts.
- e. On Part 10.D., Question 23 of his Application for Naturalization (Form N-400), in response to the question "Have you ever given false or misleading information to any U.S. Government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal?" he answered "No" when in fact, as he then knew, he had made willful and material false statements and misrepresentations on his March 20, 2007, Application to Register Permanent Residence or Adjust Status (Form I-485) when he failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash," his immigration arrest on June 22, 1989, and his deportation from the United States on July 6, 1989.
- f. On Part 10.E., Question 24 of his Application for Naturalization (Form N-400), in response to the question "Have you ever lied to any U.S. Government official to gain entry into or admission into the United States?" he answered "No" when in fact, as he then knew, he had lied to Immigration and Naturalization Service officials at the Logan International Airport in Boston, Massachusetts on June 22, 1989, when he applied for admission into the United States using the false name "Bawabhai Wadiwala Chandraprakash" and a page-substituted fraudulent passport in the same name.
- g. On Part 10.E., Question 26 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been removed, excluded, or deported from the United States?" he answered "No" when in fact, as he then knew, he had been excluded and deported from the United States on July 6, 1989, at the Logan International Airport in Boston, Massachusetts.

- h. On Part 10.E., Question 27 of his Application for Naturalization (Form N-400), in response to the question "Have you ever been ordered to be removed, excluded, or deported from the United States?" he answered "No" when in fact, as he then knew, he had been ordered excluded and deported from the United States on June 29, 1989, at Boston, Massachusetts.

All in violation of Title 18, United States Code, Section 1425(b).

COUNT SEVEN

On or about July 11, 2016, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did willfully and knowingly use United States passport # XXXXX5882, the issue of which was secured in any way by reason of any false statement, that is, in the application for such passport the defendant failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash" and submitted Certificate of Naturalization # XXXXX1590, which the defendant knew to have been fraudulently procured.

All in violation of Title 18, United States Code, Section 1542.

COUNT EIGHT

On or about July 11, 2016, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly possess a document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, that is, United States passport # XXXXX5882, knowing such document was procured by fraud and unlawfully obtained.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT NINE

On or about July 11, 2016, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly use documentary evidence of citizenship, that is, United States passport # XXXXX5882, knowing such document was procured by fraud and false evidence, and otherwise unlawfully obtained, in that, the defendant obtained such passport by virtue of his naturalization as a United States citizen, which the defendant knew to have been fraudulently procured.

All in violation of Title 18, United States Code, Section 1015(c).

COUNT TEN

On or about June 27, 2017, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did willfully and knowingly use United States passport # XXXXX5882, the issue of which was secured in any way by reason of any false statement, that is, in the application for such passport the defendant failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash" and submitted Certificate of Naturalization # XXXXX1590, which the defendant knew to have been fraudulently procured.

All in violation of Title 18, United States Code, Section 1542.

COUNT ELEVEN

On or about June 27, 2017, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly possess a document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, that is, United States passport # XXXXX5882, knowing such document was procured by fraud and unlawfully obtained.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT TWELVE

On or about June 27, 2017, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly use documentary evidence of citizenship, that is, United States passport # # XXXXX5882, knowing such document was procured by fraud and false evidence, and otherwise unlawfully obtained, in that, the defendant obtained such passport by virtue of his naturalization as a United States citizen, which the defendant knew to have been fraudulently procured.

All in violation of Title 18, United States Code, Section 1015(c).

COUNT THIRTEEN

On or about March 27, 2018, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did willfully and knowingly use United States passport # XXXXX5882, the issue of which was secured

in any way by reason of any false statement, that is, in the application for such passport the defendant failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash" and submitted Certificate of Naturalization # XXXXX1590, which the defendant knew to have been fraudulently procured.

All in violation of Title 18, United States Code, Section 1542.

COUNT FOURTEEN

On or about March 27, 2018, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly possess a document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, that is, United States passport # XXXXX5882, knowing such document was procured by fraud and unlawfully obtained.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT FIFTEEN

On or about March 27, 2018, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly use documentary evidence of citizenship, that is, United States passport # XXXXX5882, knowing such document was procured by fraud and false evidence, and otherwise unlawfully obtained, in that, the defendant obtained such passport by virtue of his naturalization as a United States citizen, which the defendant knew to have been fraudulently procured.

All in violation of Title 18, United States Code, Section 1015(c).

COUNT SIXTEEN

On or about July 17, 2019, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did willfully and knowingly use United States passport # XXXXX5882, the issue of which was secured in any way by reason of any false statement, that is, in the application for such passport the defendant failed to disclose his prior use of the name "Bawabhai Wadiwala Chandraprakash" and submitted Certificate of Naturalization # XXXXX1590, which the defendant knew to have been fraudulently procured.

All in violation of Title 18, United States Code, Section 1542.

COUNT SEVENTEEN

On or about July 17, 2019, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly possess a document prescribed by statute and regulation for entry into and as evidence of authorized stay and employment in the United States, that is, United States passport # XXXXX5882, knowing such document was procured by fraud and unlawfully obtained.

All in violation of Title 18, United States Code, Section 1546(a).

COUNT EIGHTEEN

On or about July 17, 2019, in the Eastern District of North Carolina and elsewhere, the defendant, PRAKASHKUMAR BAVABHAI PATEL, did knowingly

use documentary evidence of citizenship, that is, United States passport # XXXXX5882, knowing such document was procured by fraud and false evidence, and otherwise unlawfully obtained, in that, the defendant obtained such passport by virtue of his naturalization as a United States citizen, which the defendant knew to have been fraudulently procured.

All in violation of Title 18, United States Code, Section 1015(c).

A TRUE BILL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

~~FOREPERSON~~

DATE: 11/18/2020

ROBERT J. HIGDON, JR.
United States Attorney

Sebastian Kielmanovich
BY: SEBASTIAN KIELMANOVICH
Assistant United States Attorney